

### REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-17 are currently pending in the application. Claims 1-6 and 8-17 are amended to correct minor informalities and cosmetic matters of form. Thus, no new matter is presented.

In the outstanding Official Action, the specification was objected to for failing to have a descriptive title; and Claims 1-17 were rejected under 35 U.S.C. §103(a) as unpatentable over Tsirtsis et al. (U.S. PG Pub. 2005/0243766, hereinafter Tsirtsis) in view of Heinonen et al. (U.S. PG Pub. 2004/0202132, hereinafter Heinonen).

Regarding the objection to the Title, the Title is amended to be similar to that recommended in the Official Action. Accordingly, Applicants respectfully request that the objection to the title be withdrawn.

The Official Action cites Tsirtsis as disclosing the Applicants' invention with the exception of transmitting a request for information from the mobile device to a transfer device. The Official Action cites Heinonen as disclosing this claimed feature and states that it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the cited references to arrive at Applicants' claims. Applicants respectfully traverse this rejection as Tsirtsis fails to teach or suggest specific features of independent Claims 1, 3, 9, 11 and 14 for which it is asserted as a primary reference under 35 U.S.C. §103.

Independent Claim 1 is directed to a communication system including a plurality of transfer devices (e.g., MAP 20) for transferring packets to a current location of a mobile terminal (e.g., MN10), a plurality of access router devices (e.g., AR 50) arranged in a network to be able to connect to the mobile terminal. The mobile terminal is connected to an

access router device to receive the packets from a transfer device through the access router device.

The system comprises:

a first transmitter configured to transmit a request for information which specifies a transfer device used by the mobile terminal for packet reception and ***an anycast address which indicates an address regarding the plurality of transfer devices, to the access router device connected to the mobile terminal;***

a second transmitter configured to transmit the request to a transfer device ***which has a shortest distance from the access router device on the network among the plurality of transfer devices, based on the anycast address relayed to be transmitted through the access router device;*** and

a third transmitter provided at the transfer device configured to transmit the information which specifies the transfer device to the mobile terminal based on the request.

Independent Claims 3, 9, 11 and 14, while directed to alternative embodiments, recite substantially similar features of transmitting a request for information including an anycast address to a transfer device via an access router, as recited in independent Claim 1.

Independent Claims 3, 9 and 11, further recite features similar to that directed to requesting information about and receiving information regarding the transfer device which has the shortest distance from the access router device also as recited in independent Claim 1.

Accordingly, the remarks and arguments presented below are applicable to each of independent Claims 1, 3, 9, 11 and 14 as outlined above.

Turning to the applied primary reference, Tsirsis describes to a method and apparatus used to support session signaling and mobility management in a network including a plurality of end nodes that interact via one or more access nodes.<sup>1</sup> The access nodes may be implemented as wireless access routers which include receiver and transmitter circuitry and

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<sup>1</sup> Tsirsis, paragraph [0026].

an interface to support communications with end nodes via a wireless communications channel.<sup>2</sup>

Tsirsis, however, fails to teach or suggest that his system includes a first transmitter configured to transmit “*an anycast address which indicates an address regarding the plurality of transfer devices to the access router device connected to the mobile terminal,*” the access router being included in the communications path between the mobile terminal and the transfer device, as recited in independent Claim 1.

In rejecting this claimed feature, the outstanding Official Action relies on Fig. 1 and paragraphs [0034], [0035], and [0040] of Tsirsis stating that “the end node registers its session signaling address with the paging location server in the visited domain, and also registers the session signaling address of the paging and location server in the visited domain with its home session signaling servers.”<sup>3</sup> Thus, in Tsirsis, each time the mobile node enters a visited domain it registers with the paging location server in that visited domain and also registers the session signaling address of the paging and location server in the visited domain with its home session signaling server. The home session signaling server then transmits messages intended for the mobile node directly to the paging and location server which then forwards the message to the mobile node. Therefore, the Official Action appears to assert that the mobile node of Tsirsis is analogous to the claimed mobile terminal, the claimed plurality of transfer devices is analogous to the paging and location server, and the plurality of access routers are analogous to the base stations.

However, as noted above, Tsirsis describes that a single paging and location server is used in a visited domain to handle connection from visiting mobile nodes. Thus, each time the mobile node moves from base station to base station in the visited domain, the mobile

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<sup>2</sup> Id.

<sup>3</sup> Outstanding Official Action, p. 3.

node must only update its address with the single paging and location server and need not find a new “transfer device” which might more easily serve the roaming mobile node.

In contrast, as discussed at pp. 1-4 of the specification, the present invention allows a mobile terminal to obtain information regarding a transfer device (e.g., MAP) which has the shortest distance from the access router device from among a plurality of transfer devices, without having to rely on a router advertisement message received from the access router.

On the other hand, Tsirsis merely describes that the end node enters a visited domain and registers with the paging and location server via a base station and transmits the address of the paging and location server to its home session signaling server. Thus, Tsirsis fails to teach or suggest that its mobile node, or any component within his system, includes a transmitter configured to transmit “*an anycast address which indicates an address regarding the plurality of transfer devices to the access router device connected to the mobile terminal,*” as recited in independent Claim 1. Instead, as noted above, Tsirsis describes that a single paging and location server is used in the visited domain and fails, at any point, to teach or suggest sending an anycast address which indicates an address regarding a *plurality of transfer devices* (e.g., paging and location servers) to an access router device, or base station, connected to the mobile terminal.

Regarding the claimed feature directed to a second transmitter configured to transmit the request to “a transfer device *which has a shortest distance from the access router device on the network among the plurality of transfer devices, based on the anycast address relayed to be transmitted through the access router device,*” as recited in independent Claim 1, the outstanding Official Action relies on paragraph [0026] and Fig. 1 of Tsirsis stating that “the access nodes may be a base station in a cellular communication system.”<sup>4</sup>

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<sup>4</sup> Id., p4.

As noted above, however, Tsirsis describes that one paging and location server (e.g., transfer device) is associated with all of the access nodes in a visited domain. Thus, Tsirsis fails to teach or suggest the transmitter that transmits a request to a transfer device which has *“a shortest distance from the access router device on the network among the plurality of transfer devices, based on the anycast address relayed to be transmitted through the access router device.”* Specifically, Tsirsis fails to teach or suggest transmitting an anycast address which indicates an address regarding a plurality of transfer devices, whatsoever, much less that such a request is sent to a transfer device having the shortest distance from an access router from among a plurality of transfer devices *based on the anycast address*, whatsoever.

Further, Heinonen, the secondary reference, describes a short range wireless access point which enables a mobile wireless device to resume an Internet service with the same network server upon interruption but fails to remedy any of the above-noted deficiencies of Tsirsis.

Amended independent Claim 16 recites a transfer device used in a communication system, comprising:

a second transmitter configured to execute packet transmission processing based on the on-link care of address regarding the mobile terminal in accordance with the instruction information, and transmit information *which specifies the transfer device* to the mobile terminal.

In addressing the above emphasized claimed feature, the outstanding Official Action relies on Fig. 1 and paragraphs [0008], [0034-0035], and [0040] of Tsirsis. As noted above, however, this cited portion of Tsirsis merely describes that an end node enters a visited domain and registers with the paging and location server via a base station and transmits the address of the paging and location server to its home session signaling server. At no point does Tsirsis teach or suggest that the transfer device includes a transmitter configured to

transmit information *which specifies the transfer device* to the mobile terminal, as recited in independent Claim 16.

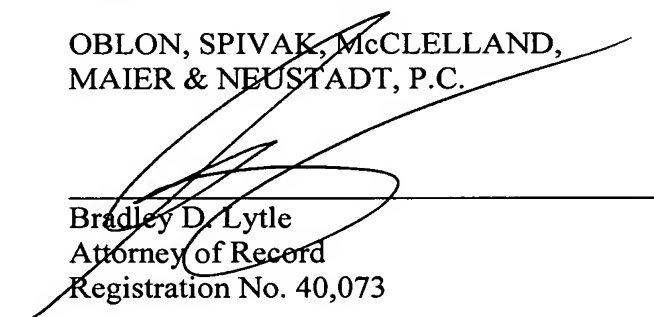
Further, Heinonen, the secondary reference, describes a short range wireless access point which enables a mobile wireless device to resume an Internet service with the same network server upon interruption but fails to remedy any of the above-noted deficiencies of Tsirsis.

Therefore, Tsirsis and Heinonen, neither alone, nor in combination, teach or suggest the above-differentiated features as recited in independent Claims 1, 3, 9, 11, 14 and 16. Accordingly, Applicants respectfully request that the rejections of these claims (and the claims that depend therefrom) under 35 U.S.C. §103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-17 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of the application is therefore requested.

Respectfully submitted,

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